

# EXHIBIT A

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Facebook, Inc.; Facebook Holdings, LLC; Facebook  
Operations, LLC; Facebook Payments, Inc.;  
Facebook Technologies, LLC; Instagram, LLC;  
Siculus, Inc.; and Mark Elliot Zuckerberg*

*Additional parties and counsel listed on  
signature pages*

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

ALL ACTIONS

MDL No. 3047

Civil Case No. 4:22-md-03047-YGR

Honorable Yvonne Gonzalez Rogers

**META DEFENDANTS' RESPONSES AND  
OBJECTIONS TO PERSONAL INJURY  
AND LOCAL GOVERNMENT  
PLAINTIFFS' THIRTEENTH SET OF  
REQUESTS FOR PRODUCTION OF  
DOCUMENTS**

Defendants Meta Platforms, Inc., Facebook Payments, Inc., Siculus, Inc., Facebook Operations, LLC, and Instagram, LLC, (collectively, "Defendants" or "Meta"), by and through their attorneys, Covington & Burling, LLP, submit their responses, after an agreed extension, to Plaintiffs' Thirteenth Set of Requests for Production of Documents ("Requests") served on May 17, 2024. Meta's responses to the Requests are made to the best of its current knowledge, information, and belief. Meta reserves the right to supplement or amend any of its responses should future investigation indicate that such supplementation or amendment is necessary.

## STATEMENTS AND OBJECTIONS TO ALL REQUESTS

1. Meta objects to the Requests herein that do not describe each item or category of items to be inspected with reasonable particularity, and/or are otherwise vague, ambiguous, overbroad, unduly burdensome, and/or disproportionate to the needs of the litigation. Meta has either offered to meet and confer with the Requesting Party on Requests that fall into one or more of the categories described above or, where appropriate, defined these Requests and/or the scope of its response as indicated in the specific objections below.

2. Meta objects to the Requests and accompanying Instructions and Definitions insofar as they seek to impose obligations in excess of or otherwise different from those imposed by the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the Local Rules of the United States District Court for the Northern District of California, or any other applicable federal or state law. Meta will comply with applicable rules, laws and court orders.

3. Meta objects to the Requests to the extent that they seek documents that contain confidential or proprietary business information, trade secrets, commercially sensitive information, or confidential personal information of Meta or a Non-Party. Responsive information, if discoverable, will be provided subject to the terms of the Protective Order (ECF No. 586) entered by the Court. Meta reserves the right to seek additional protections beyond those provided in the Protective Order to the extent appropriate for any particularly sensitive documents and/or to object to their production altogether if, for example, their relevance is substantially outweighed by the risk of harm posed by their production in light of the protections available.

4. Meta objects to the Requests to the extent that they seek documents or other materials that are not related to Youth in combination with the Named Features or addictive/compulsive use or harms to mental health. Wherever in the specific responses below Meta agrees to produce document(s) to the extent “relevant” to the issues in the case, Meta defines “relevant” for purposes of these responses only to mean documents that discuss Youth and that also discuss one or more of the Named Features or addictive/compulsive use or harms to mental health. Meta reserves its rights to assert a more targeted scope of relevance for purposes of dispositive motions and trial.

1           5. Meta objects to the Requests to the extent that they seek materials relating to users located  
2 outside of the United States and/or features not available in the United States. Meta will produce  
3 documents relating to users in the United States.

4           6. Meta objects to Definition No. 6 (“Facebook Platform”) as vague, ambiguous, overbroad,  
5 unduly burdensome, and not proportional to the needs of the case to the extent that it includes versions of  
6 Facebook’s platforms not publicly released or publicly available during the Relevant Time Period, as well  
7 as features or surfaces not publicly released or publicly available during the Relevant Time Period.

8           7. Meta objects to Definition No. 7 (“Facebook Messenger Platform”) as vague, ambiguous,  
9 overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it includes  
10 versions of Facebook Messenger’s platforms not publicly released or publicly available during the  
11 Relevant Time Period, as well as features or surfaces not publicly released or publicly available during  
12 the Relevant Time Period.

13           8. Meta objects to Definition No. 8 (“Instagram Platform”) as vague, ambiguous, overbroad,  
14 unduly burdensome, and not proportional to the needs of the case to the extent that it includes versions of  
15 Instagram’s platforms not publicly released or publicly available during the Relevant Time Period, as well  
16 as features or surfaces not publicly released or publicly available during the Relevant Time Period.

17           9. Meta objects to Definition No. 16 (“Relating to,” “relate to,” “concerning,” or “concern”) to  
18 the extent that, as used in the Requests, they render those Requests vague, ambiguous, overbroad, unduly  
19 burdensome, and not proportional to the needs of the case. Meta will generally interpret these terms to  
20 mean “discussing,” “referring to,” or “reflecting,” or otherwise to have an objective and apparent reference  
21 to the stated subject.

22           10. Meta objects to Definition No. 24 (“Your Platform” as “Facebook or Instagram Platforms”)  
23 as vague, ambiguous, overbroad, unduly burdensome, and not proportional to the needs of the case to the  
24 extent they include versions of Instagram’s or Facebook’s platforms not publicly released or publicly  
25 available during the Relevant Time Period, as well as features or surfaces not publicly released or publicly  
26 available during the Relevant Time Period.

1 11. Meta objects to Definition No. 25 (“Youth”) to the extent that it encompasses users that are  
2 older than eighteen years of age (18) or younger than the age of thirteen (13). Meta will generally interpret  
3 this term to mean users at least 13 years of age and below the age of 18.

4 12. Meta objects to Plaintiffs’ Instruction No. 2 to the extent that it purports to require that “[e]ach  
5 Responding Party must respond separately” as without justification, unduly burdensome, and not  
6 proportional to the needs of the case. Meta provides these responses and objections collectively, which  
7 are made on behalf of each of the Meta Defendant entities.

8 13. Meta objects to the Requests to the extent that they purport to impose duties or requirements  
9 on Meta beyond those contained in the ESI Order and other orders, rules, or agreements applicable to this  
10 case.

11 14. Meta objects to the Requests to the extent that they seek the production of information  
12 protected by the attorney-client privilege, the work-product doctrine, and/or any other applicable privilege,  
13 immunity, or protection. Meta relatedly objects to Plaintiffs’ Instruction No. 4 to the extent that it purports  
14 to impose duties or requirements on Meta beyond those contained in the Privilege Log Protocol and other  
15 orders, rules, or agreements applicable to this case. To the extent Meta does withhold any documents,  
16 Meta will produce a privilege log pursuant to the Privilege Log Protocol entered by the Court.

17 15. Meta objects to the Relevant Time Period specified in Instruction No. 11 (“from the date You  
18 first researched, designed, or developed the Facebook Platform or any of its predecessors to the present”)  
19 as overbroad because it includes, *inter alia*, time periods for which claims would be barred under the  
20 relevant statute of limitations, time periods before and after the relevant underlying events, and time  
21 periods that postdate the filing of this action. Meta also objects to Plaintiffs’ proposed Relevant Time  
22 Period as disproportionate given the huge quantities of data and documents that already would need to be  
23 collected, stored and searched even for a shorter time period. For purposes of these responses and  
24 objections, Meta treats the Relevant Time Period as the period(s) ordered by Judge Kang.

25 16. Meta’s responses are made without waiving or intending to waive (a) the right to object on  
26 any ground to the use of these responses, or their subject matter, in any subsequent proceeding or the trial  
27 of this or any other action; (b) the right to object to a demand for further responses to this or any other  
28

1 discovery involving or related to the subject matter of the Requests; and (c) the right at any time to revise,  
2 correct, add to, or clarify any or all of the objections.

3 17. Any response to the Requests by Meta indicating that documents will be searched for and/or  
4 produced is not an indication or representation that responsive information or documents exist within  
5 Meta's possession, custody, or control, but only that Meta intends, subject to its objections, to conduct a  
6 reasonable and proportionate search for responsive information in files that are reasonably believed to  
7 contain responsive information, for the Relevant Time Period. This reasonable and proportionate search  
8 will be conducted pursuant to the ESI Order. Meta's search may include application of appropriate search  
9 terms to collect information and documents, further review for responsiveness, privilege, and confidential  
10 or private information, and may use additional search or review techniques, such as Technology-Assisted  
11 Review. For purposes of these Requests, when Meta refers to "custodians," Meta means the agreed-upon  
12 custodians that Meta identified by list to Plaintiffs, including as that list might later be modified by  
13 subsequent agreement of the parties.

14 18. To the extent not otherwise objected to, Meta will endeavor to produce final versions of  
15 documents saved as of the time of collection to shared drives or the most recent versions saved to  
16 custodians' drives or attached to responsive emails. Meta will not endeavor to locate or recreate or  
17 produce all draft versions that might exist or be recoverable, including draft versions of documents  
18 automatically created on cloud or server-based storage systems, as doing so would be unduly burdensome  
19 and disproportionate to the needs of the litigation. Meta will be willing to meet and confer concerning  
20 any targeted Request from Plaintiffs seeking draft versions of a specified document.

21 19. By responding to a Request with a defined term, Meta is not by implication agreeing with any  
22 such definition.

23 20. Meta is willing to meet and confer concerning the Requests and these responses.  
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**REQUEST NO. 317:**

A copy of Mark Zuckerberg’s public and/or internal statements regarding Your Fourth Quarter performance in 2017, the MSI metric, and its effects on daily usage of the Facebook Platform.

**RESPONSE:**

Meta objects to this Request as overbroad, seeking information that is not relevant to the claims and defenses in the case, unduly burdensome, and not proportional to the needs of the case in that it seeks “public and/or internal statements” whether or not they discuss Youth or Youth mental health. Meta further objects to this Request as vague and ambiguous in that it seeks statements “regarding” specified topics, which Meta will generally interpret to mean “discussing” or “referring to” said topics. Meta further objects to this Request to the extent the information sought is already in the possession of Plaintiffs, or is otherwise equally accessible and available to them from the public record. Meta further objects to the undefined terms “performance,” “MSI metric,” “effects”, and “daily usage,” making this Request vague and ambiguous.

Subject to and without waiving its objections, Meta will conduct a reasonable and proportionate search of the documents of non-duplicative custodians using Meta’s search terms as agreed to by the parties or resolved by court order as applicable in compliance with the ESI Order and, if located, will produce them if non-privileged and relevant to the claims or defenses in this case. Meta will inform Plaintiffs if such documents are found but not produced based on an assertion of privilege (through a privilege log entry).

**REQUEST NO. 318:**

Copies of Mark Zuckerberg’s public and/or internal statements regarding each of Facebook’s earnings reports during the Relevant Time Period.

**RESPONSE:**

Meta objects to this Request as overbroad, seeking information that is not relevant to the claims or defenses in the case, unduly burdensome, and not proportional to the needs of the case in that it seeks “public and/or internal statements” whether or not they discuss Youth or Youth mental health. Meta further objects to this Request as vague and ambiguous in that it seeks statements “regarding . . . Facebook’s earning reports,” which Meta will generally interpret to mean “discussing” or “referring to” said reports. Meta further objects to this Request to the extent the information sought is already in the possession of Plaintiffs, or is otherwise equally accessible and available to them from the public record.



1 Plaintiffs if such documents are found but not produced based on an assertion of privilege (through a  
2 privilege log entry).

3 **REQUEST NO. 324:**

4 All Documents and Communications relating to the article published by the Wall Street Journal  
5 on August 13, 2017, titled “Facebook’s Onavo Gives Social-Media Firm Inside Peek at Rivals’ Users.”

6 **RESPONSE:**

7 Meta objects to this Request as overbroad, seeking information that is not relevant to the claims or  
8 defenses in the case, unduly burdensome, and not proportional to the needs of the case in that it seeks  
9 “[a]ll Documents and Communications” whether or not they relate to Youth or Youth mental health. Meta  
10 further objects to this Request as vague and ambiguous in that it seeks documents “relating to” the  
11 referenced article, which Meta will generally interpret to mean “referring to” or “discussing” said article.  
12 Meta further objects to this Request to the extent the information sought is already in the possession of  
13 Plaintiffs, or is otherwise equally accessible and available to them from the public record.

14 Subject to and without waiving its objections, Meta will conduct a reasonable and proportionate  
15 search of the documents of non-duplicative custodians using Meta’s search terms as agreed to by the  
16 parties or resolved by court order as applicable in compliance with the ESI Order and, if located, will  
17 produce them if non-privileged and relevant to the claims or defenses in this case. Meta will inform  
18 Plaintiffs if such documents are found but not produced based on an assertion of privilege (through a  
19 privilege log entry).

20 **REQUEST NO. 325:**

21 All Documents reflecting Onavo data that compares the relative performance of Snapchat, TikTok  
22 and YouTube, on the one hand, and the Facebook Platform and/or Instagram Platform on the other,  
23 between 2017 and the Present.

24 **RESPONSE:**

25 Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the needs  
26 of the case to the extent that it seeks information that is not relevant to the claims or defenses in this case,  
27 including by seeking information beyond the scope of Youth users or the Named Features. Meta further  
28 objects to this Request to the extent that it seeks detailed technical information or raw data the production,

1 aggregation, and/or assortment of which would be highly burdensome in ways that are disproportionate  
2 to the needs of the case. Meta further objects to the undefined terms “Onavo data” and “performance,”  
3 making this Request vague and ambiguous.

4 Subject to and without waiving its objections, Meta will conduct a reasonable and proportionate  
5 search of the documents of non-duplicative custodians using Meta’s search terms as agreed to by the  
6 parties or resolved by court order as applicable in compliance with the ESI Order and, if located, will  
7 produce them if non-privileged and relevant to the claims or defenses in this case. Meta will inform  
8 Plaintiffs if such documents are found but not produced based on an assertion of privilege (through a  
9 privilege log entry).

10 **REQUEST NO. 326:**

11 All Documents and Communications relating to a June 2018 meeting in which Mark Zuckerberg  
12 referred to himself as a “wartime CEO,” including presentations, meeting minutes, and audiovisual  
13 recordings.

14 **RESPONSE:**

15 Meta objects to this Request as overbroad, seeking information that is not relevant to the claims or  
16 defenses in the case, unduly burdensome, and not proportional to the needs of the case in that it seeks  
17 “[a]ll Documents and Communications” whether or not they discuss Youth or Youth mental health. Meta  
18 further objects to this Request as vague and ambiguous in that it seeks documents “relating to” a meeting,  
19 which Meta will generally interpret to mean “discussing” or “referring to” said meeting. Meta further  
20 objects to this Request to the extent it assumes the existence of written records or audio or video recordings  
21 of internal meetings held by Meta employees.

22 Subject to and without waiving its objections, Meta will conduct a reasonable and proportionate  
23 search of the documents of non-duplicative custodians using Meta’s search terms as agreed to by the  
24 parties or resolved by court order as applicable in compliance with the ESI Order and, if located, will  
25 produce them if non-privileged and relevant to the claims or defenses in this case. Meta will inform  
26 Plaintiffs if such documents are found but not produced based on an assertion of privilege (through a  
27 privilege log entry).  
28

**REQUEST NO. 334:**

A copy of the 2019 Facebook guidance Document regarding product changes that included the following quote: “Rule #1, DAP is Sacred.”

**RESPONSE:**

Meta objects to this Request as overbroad, seeking information that is not relevant to the claims or defenses in the case, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks a document that does not discuss Youth or Youth mental health. Meta further objects to the Request as vague, ambiguous, unduly burdensome, and not stated with reasonable particularity in that seeks a document where the words “Rule #1, DAP is Sacred” were purportedly used, but does not give any identifying information other than an approximate year. Meta further objects to this Request to the extent the information sought is already in the possession of Plaintiffs, or is otherwise equally accessible and available to them from the public record.

Subject to and without waiving these objections, Meta will conduct a reasonable and proportionate search in compliance with the ESI Order for the referenced 2019 guidance document containing the specified quoted language and, if located, will produce it if non-privileged. Meta will inform Plaintiffs if the document is found but not produced based on an assertion of privilege (through a privilege log entry).

**REQUEST NO. 335:**

Documents sufficient to show the results of all backtests and/or uses of the Deltoid tool that measured the impact of product changes related to the Named Features on integrity metrics.

**RESPONSE:**

Meta objects to this Request as duplicating Request No. 2, as to which the parties have previously met and conferred. Meta further objects to this Request as overbroad, seeking information that is not relevant to the claims or defenses in the case, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks documents that do not discuss Youth or Youth mental health and without limitation to the Relevant Time Period. Meta further objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case in that it seeks documents sufficient to show “the results of all backtests and/or uses of the Deltoid tool” without limiting the Request to final reports of such tests but potentially also seeking burdensome data and programs. Meta further objects to this Request to the extent that it seeks detailed technical information or raw data, the production, aggregation,

1 and/or assortment of which would be highly burdensome in ways that are disproportionate to the needs of  
2 the case. Meta further objects to the undefined terms “impact,” “product changes,” and “integrity  
3 metrics,” making this Request vague and ambiguous.

4 Subject to and without waiving its objections, Meta refers to its prior meet and confer  
5 communications concerning Request No. 2. In addition, Meta will conduct a reasonable and proportionate  
6 search of the documents of non-duplicative custodians using Meta’s search terms as agreed to by the  
7 parties or resolved by court order as applicable in compliance with the ESI Order and, if located, will  
8 produce them if non-privileged and relevant to the claims or defenses in this case. Meta will inform  
9 Plaintiffs if such documents are found but not produced based on an assertion of privilege (through a  
10 privilege log entry).

11 **REQUEST NO. 336:**

12 Documents sufficient to identify the names and titles of the researchers who specialize in suicide  
13 prevention who were given access to the CrowdTangle tool in or around 2019.

14 **RESPONSE:**

15 Meta objects to this Request as overbroad, seeking information that is not relevant to the claims or  
16 defenses in the case, unduly burdensome, and not proportional to the needs of the case to the extent that  
17 it seeks documents that do not discuss Youth. Meta further objects to this Request as being insufficiently  
18 specified, apparently requiring Meta to investigate to determine which researchers, if any, were given  
19 access to a named tool in some year around 2019, and then to search for documents identifying those  
20 names. The Request is more appropriate for a deposition question. Meta further objects to this Request  
21 to the extent that the information sought is already in the possession of Plaintiffs, or is otherwise equally  
22 accessible and available to them from the public record.

23 Subject to and without waiving its objections, Meta will conduct a reasonable and proportionate  
24 search of the documents of non-duplicative custodians using Meta’s search terms as agreed to by the  
25 parties or resolved by court order as applicable in compliance with the ESI Order and, if located, will  
26 produce them if non-privileged and relevant to the claims or defenses in this case. Meta will inform  
27 Plaintiffs if such documents are found but not produced based on an assertion of privilege (through a  
28 privilege log entry).

1 Subject to and without waiving these objections, Meta will conduct a reasonable and proportionate  
 2 search in compliance with the ESI Order for the referenced 2020 document containing the specified quoted  
 3 language and, if located, will produce it if non-privileged. Meta will inform Plaintiffs if the document is  
 4 found but not produced based on an assertion of privilege (through a privilege log entry).

5 **REQUEST NO. 343:**

6 All Documents relating to the proposed Smart Defaults feature on the Instagram Platform as  
 7 referenced in META3047MDL-003-00104482.

8 **RESPONSE:**

9 Meta objects to this Request as overbroad, seeking information that is not relevant to the claims or  
 10 defenses in the case, unduly burdensome, and not proportional to the needs of the case in that it seeks  
 11 “[a]ll Documents” whether or not they discuss Youth or Youth mental health and without limitation to the  
 12 Relevant Time Period. Meta further objects to this Request to the extent that it seeks detailed technical  
 13 information or raw data the production, aggregation, and/or assortment of which would be highly  
 14 burdensome in ways that are disproportionate to the needs of the case. Meta further objects to this Request  
 15 as vague and ambiguous in that it seeks documents “relating to” the referenced feature, which Meta will  
 16 generally interpret to mean “referring to” or “discussing” said feature. Meta further objects to this Request  
 17 to the extent the information sought is already in the possession of Plaintiffs, or is otherwise equally  
 18 accessible and available to them from the public record.

19 Subject to and without waiving its objections, Meta will conduct a reasonable and proportionate  
 20 search of the documents of non-duplicative custodians using Meta’s search terms as agreed to by the  
 21 parties or resolved by court order as applicable in compliance with the ESI Order and, if located, will  
 22 produce them if non-privileged and relevant to the claims or defenses in this case. Meta will inform  
 23 Plaintiffs if such documents are found but not produced based on an assertion of privilege (through a  
 24 privilege log entry).

25 **REQUEST NO. 344:**

26 All Documents and Communications discussing the Civic Integrity’s development of “Break the  
 27 Glass” measures, including the “PL7,” “PE2,” and “P50 Sigmoid Demotion” measures, and any other  
 28 measures that could temporarily disable certain features of the Facebook Platform (e.g., group  
 recommendations).

**RESPONSE:**

Meta objects to this Request as overbroad, seeking information that is not relevant to the claims or defenses in the case, unduly burdensome, and not proportional to the needs of the case in that it seeks “[a]ll Documents and Communications” whether or not they discuss Youth or Youth mental health and without limitation to the Relevant Time Period. Meta further objects to this Request to the extent that it seeks detailed technical information or raw data the production, aggregation, and/or assortment of which would be highly burdensome in ways that are disproportionate to the needs of the case. Meta further objects to this Request to the extent the information sought is already in the possession of Plaintiffs, or is otherwise equally accessible and available to them from the public record.

Subject to and without waiving its objections, Meta will conduct a reasonable and proportionate search of the documents of non-duplicative custodians using Meta’s search terms as agreed to by the parties or resolved by court order as applicable in compliance with the ESI Order and, if located, will produce them if non-privileged and relevant to the claims or defenses in this case. Meta will inform Plaintiffs if such documents are found but not produced based on an assertion of privilege (through a privilege log entry).

**REQUEST NO. 345:**

Documents sufficient to show the absolute and relative size of Your user base that has received control versions of the Instagram and Facebook Platforms as part of a “holdout” and/or “Minimum Integrity Holdout” population, at all points during the Relevant Time Period.

**RESPONSE:**

Meta objects to this Request as overbroad, seeking information that is not relevant to the claims or defenses in the case, unduly burdensome, and not proportional to the needs of the case in that it seeks “[d]ocuments sufficient to show” whether or not they discuss Youth or Youth mental health. Meta further objects to this Request to the extent that it seeks detailed technical information or raw data the production, aggregation, and/or assortment of which would be highly burdensome in ways that are disproportionate to the needs of the case. Meta further objects to the undefined terms “holdout” and “Minimum Integrity Holdout,” making this Request vague and ambiguous.

1 Subject to and without waiving its objections, Meta will conduct a reasonable and proportionate  
 2 search of the documents of non-duplicative custodians using Meta's search terms as agreed to by the  
 3 parties or resolved by court order as applicable in compliance with the ESI Order and, if located, will  
 4 produce them if non-privileged and relevant to the claims or defenses in this case. Meta will inform  
 5 Plaintiffs if such documents are found but not produced based on an assertion of privilege (through a  
 6 privilege log entry).

7 **REQUEST NO. 346:**

8 All Communications relating to Your decision to create, modify, or eliminate a "holdout" and/or  
 9 "Minimum Integrity Holdout" population for the Instagram and/or Facebook Platforms.

10 **RESPONSE:**

11 Meta objects to this Request as overbroad, seeking information that is not relevant to the claims or  
 12 defenses in the case, unduly burdensome, and not proportional to the needs of the case in that it seeks  
 13 "[a]ll Communications" whether or not they discuss Youth or Youth mental health and without limitation  
 14 to the Relevant Time Period. Meta further objects to the phrase "Your decision to create, modify, or  
 15 eliminate," suggesting potentially multiple decisions, and the undefined terms "holdout" and "Minimum  
 16 Integrity Holdout," making this Request vague and ambiguous.

17 Subject to and without waiving its objections, Meta will conduct a reasonable and proportionate  
 18 search of the documents of non-duplicative custodians using Meta's search terms as agreed to by the  
 19 parties or resolved by court order as applicable in compliance with the ESI Order and, if located, will  
 20 produce them if non-privileged and relevant to the claims or defenses in this case. Meta will inform  
 21 Plaintiffs if such documents are found but not produced based on an assertion of privilege (through a  
 22 privilege log entry).

23 **REQUEST NO. 347:**

24 All Documents and Communications reflecting Your research into any Safety issues faced by users  
 25 included in the "holdout" and/or "Minimum Integrity Holdout" population.

26 **RESPONSE:**

27 Meta objects to this Request as overbroad, seeking information that is not relevant to the claims or  
 28 defenses in the case, unduly burdensome, and not proportional to the needs of the case in that it seeks

1 produce them if non-privileged and relevant to the claims or defenses in this case. Meta will inform  
 2 Plaintiffs if such documents are found but not produced based on an assertion of privilege (through a  
 3 privilege log entry).

4 **REQUEST NO. 357:**

5 All Documents and Communications relating to the Net Ego Unit space on a users' homefeed and  
 6 its relationship to ads on a user's homefeed.

7 **RESPONSE:**

8 Meta objects to this Request as overbroad, seeking information that is not relevant to the claims or  
 9 defenses in the case, unduly burdensome, and not proportional to the needs of the case in that it seeks  
 10 "[a]ll Documents and Communications" whether or not they discuss Youth or Youth mental health and  
 11 without limitation to the Relevant Time Period. Meta further objects to this Request as vague and  
 12 ambiguous in that it seeks documents "relating to" the referenced topics, which Meta will generally  
 13 interpret to mean "referring to" or "discussing" said topics. Meta further objects to the undefined terms  
 14 "Net Ego Unit space," homefeed," and "relationship," making this Request vague and ambiguous. Meta  
 15 further objects to this Request to the extent that it seeks detailed technical information or raw data the  
 16 production, aggregation, and/or assortment of which would be highly burdensome in ways that are  
 17 disproportionate to the needs of the case. Meta further objects to this Request to the extent the information  
 18 sought is already in the possession of Plaintiffs, or is otherwise equally accessible and available to them  
 19 from the public record.

20 Subject to and without waiving its objections, Meta will conduct a reasonable and proportionate  
 21 search of the documents of non-duplicative custodians using Meta's search terms as agreed by the parties  
 22 or resolved by court order as applicable in compliance with the ESI Order and, if located, will produce  
 23 them if non-privileged and relevant to the claims or defenses in this case. Meta will inform Plaintiffs if  
 24 such documents are found but not produced based on an assertion of privilege (through a privilege log  
 25 entry).

26 **REQUEST NO. 358:**

27 Documents sufficient to show the results of every Main Tracking Survey (MTS).  
 28



1 Dated: June 28, 2024

Respectfully submitted,

3 **COVINGTON & BURLING LLP**

4 /s/ Ashley M. Simonsen

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